Exhibit 1

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

GREGORY W. ABBOTT, *et al.*,

Defendants.

Civil Action No. 5:21-cv-844 (XR)
(Consolidated Cases)

SUPPLEMENT TO PLAINTIFF UNITED STATES' AMENDED INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(e), the United States submits this supplement to its amended initial disclosures, ECF No. 132-1. The disclosures are based on information and documents that are presently available or specifically known to the United States. It is anticipated that further discovery and investigation may reveal additional witnesses, information, or documents. The United States reserves the right to rely on such additional discovery and investigations and to supplement its disclosures as warranted thereby. The disclosures are made in a good faith effort to supply as much information and specification as is presently known but shall not prejudice the United States in relation to further discovery and investigations. The disclosures below reference to the categories set forth in Federal Rule 26(a)(1)(i)-(iv) and by this Court during its November 16, 2021 status conference.

Rule 26(a)(1)(A)(i): The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

1. **Additional Tier 1 Individuals:**

   a. Remi Garza, Cameron County Department of Elections, 1050 E. Madison Street, Brownsville, TX 78520. (956) 544-0809. Mr. Garza will likely have discoverable information regarding procedures for identifying and establishing eligibility of absentee ballot by mail applicants and absentee ballot by mail voters prior to the enactment of SB 1, the scope and nature of voter assistance provided at polling places in Cameron County, and the impact of SB 1.

   b. Toby Cole, 1616 S. Voss Road Suite 450, Houston, TX 77057. (713) 805-3522. Mr. Cole will likely have discoverable information regarding voter assistance and the impact of SB 1 on voter assistance.

   c. Pamela Gaskin, c/o Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741. (512) 474-5073. Ms. Gaskin will likely have discoverable information regarding the impact of SB 1 on voters who seek to cast absentee ballots by mail.

   d. J. Scott Wiedmann, Federal Voting Assistance Program, Defense Personnel and Family Support Office, 4800 Mark Center Drive, Suite 05e22, Alexandria, VA 22350. (571) 255-9755. Mr. Wiedmann will likely have discoverable information regarding the impact of SB 1 on voters who are covered by the Uniformed and Overseas Citizens Absentee Voting Act, 52 U.S.C. § 20301.

   e. Hyunja Norman, c/o Lawyers' Committee for Civil Rights Under Law, 1500 K Street, Suite 900, Washington, DC 20005. (202) 662-8600. Ms. Norman will likely have discoverable information regarding voter assistance and the impact of SB 1 on voter assistance.

   f. Amatullah Contractor, c/o Asian American Legal Defense and Education Fund, 99 Hudson Street, 12th Floor, New York, NY 10013. (212) 966-5932. Ms. Contractor will likely have discoverable information regarding voter assistance and the impact of SB 1 on voter assistance.

Date: April 1, 2022

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KRISTEN CLARKE
Assistant Attorney General
Civil Rights Division

PAMELA S. KARLAN
Principal Deputy Assistant Attorney General
Civil Rights Division

/s/ Daniel J. Freeman
T. CHRISTIAN HERREN, JR.
RICHARD A. DELLHEIM
DANIEL J. FREEMAN
DANA PAIKOWSKY
MICHAEL E. STEWART
JENNIFER YUN
Attorneys, Voting Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

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CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2022, I served a true and correct copy of the foregoing via electronic mail on all counsel of record.

/s/ Daniel J. Freeman
Daniel J. Freeman
Voting Section
Civil Rights Division
U.S. Department of Justice
daniel.freeman@usdoj.gov